

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:18-cr-00120-BP-1
)	
JAMES REECE VANCE.)	
)	
Defendant.)	

**MOTION FOR PERMSSION TO TRAVEL OUTSIDE
THE WESTERN DISTRICT OF MISSOURI**

COMES NOW the defendant, James Vance, by and through his counsel, Carie Allen, Assistant Federal Public Defender for the Western District of Missouri, and moves this Court for permission to travel from the Madison, Alabama area to Kissimmee, Florida.

SUGGESTIONS IN SUPPORT OF MOTION

1. Mr. Vance has been on pretrial release since the onset of this case and has had no compliance issues.
2. As a condition of pretrial release, the Court ordered that Mr. Vance not travel outside of his regional area, and he has been compliant with this condition.
3. Mr. Vance's father-in-law has Parkinson's disease and is currently in hospice care. It is anticipated that he will not survive much longer. Upon the death of his father-in-law, Mr. Vance would request permission to travel to Kissimmee, Florida

for funeral services. He anticipates that the trip would only take four days.

4. Obviously, the exact dates of travel are currently unknown. Mr. Vance would simply request that the court grant him permission to travel “after his father-law’s death.”

5. Pretrial Service has indicated that there is no objection to this planned travel.

6. Assistant. U.S. Attorney, Catherine Connelly, also has no objection.

7. Mr. Vance has appeared at all Court proceedings as required. He has appeared at all meetings as required and he has maintained constant communication with the pretrial service office without incident. He appropriately sought permission to travel through his probation officer in this case, who requested that he file a motion with the court.

WHEREFORE, the defendant, James Vance, respectfully requests this Court to allow him to travel outside to Kissimmee, Florida in order to attend the funeral of his father-in-law.

Respectfully submitted,

/s/ Carie Allen

Carie Allen

Assistant Federal Public Defender

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

In accordance with Rule 49(a), (b) and (d), Fed. R. Crim. P., and Rule 5(b), Fed. R. Civ. P., it is hereby CERTIFIED that on July 31, 2018, the foregoing motion was electronically filed and delivered to Catherine Connelly, Asst. U.S. Attorney, 400 E. 9th, Kansas City, MO 64106.

/s/ Carie Allen

Carie Allen